1		
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9	512-322-2672 francesca.eick@bakerbotts.com	
10	Counsel for the Utilities	
I		
11	UNITED STATES	DISTRICT COURT
	FOR THE EASTERN DIS	DISTRICT COURT TRICT OF WASHINGTON
12	FOR THE EASTERN DIS	DISTRICT COURT TRICT OF WASHINGTON No. 1:23-cv-03070-SAB
12	JAMON RIVERA, an individual; INLAND NW AGC, a membership organization; SPOKANE HOME BUILDER'S ASSOCIATION, a	TRICT OF WASHINGTON
12 13	JAMON RIVERA, an individual; INLAND NW AGC, a membership organization; SPOKANE HOME BUILDER'S ASSOCIATION, a nonprofit corporation; WASHINGTON STATE	TRICT OF WASHINGTON No. 1:23-cv-03070-SAB DECLARATION OF BRIAN L.
12 13 14	JAMON RIVERA, an individual; INLAND NW AGC, a membership organization; SPOKANE HOME BUILDER'S ASSOCIATION, a nonprofit corporation; WASHINGTON STATE ASSOCIATION OF UA PLUMBERS, PIPEFITTERS AND HVAC/R	TRICT OF WASHINGTON No. 1:23-cv-03070-SAB DECLARATION OF BRIAN L.
12 13 14 15	JAMON RIVERA, an individual; INLAND NW AGC, a membership organization; SPOKANE HOME BUILDER'S ASSOCIATION, a nonprofit corporation; WASHINGTON STATE ASSOCIATION OF UA PLUMBERS, PIPEFITTERS AND HVAC/R SERVICE TECHNICIANS, a labor organization; CONDRON HOMES LLC, a limited liability company;	TRICT OF WASHINGTON No. 1:23-cv-03070-SAB DECLARATION OF BRIAN L.
12 13 14 15	JAMON RIVERA, an individual; INLAND NW AGC, a membership organization; SPOKANE HOME BUILDER'S ASSOCIATION, a nonprofit corporation; WASHINGTON STATE ASSOCIATION OF UA PLUMBERS, PIPEFITTERS AND HVAC/R SERVICE TECHNICIANS, a labor organization; CONDRON HOMES LLC, a limited liability company; PARAS HOMES LLC, a limited	TRICT OF WASHINGTON No. 1:23-cv-03070-SAB DECLARATION OF BRIAN L.
112 113 114 115 116 117	JAMON RIVERA, an individual; INLAND NW AGC, a membership organization; SPOKANE HOME BUILDER'S ASSOCIATION, a nonprofit corporation; WASHINGTON STATE ASSOCIATION OF UA PLUMBERS, PIPEFITTERS AND HVAC/R SERVICE TECHNICIANS, a labor organization; CONDRON HOMES LLC, a limited liability company; PARAS HOMES LLC, a limited liability company; GARCO CONSTRUCTION INC., a for-profit corporation, NATIONAL PROPANE GAS ASSOCIATION, a national trade	TRICT OF WASHINGTON No. 1:23-cv-03070-SAB DECLARATION OF BRIAN L.
111 112 113 114 115 116 117 118	JAMON RIVERA, an individual; INLAND NW AGC, a membership organization; SPOKANE HOME BUILDER'S ASSOCIATION, a nonprofit corporation; WASHINGTON STATE ASSOCIATION OF UA PLUMBERS, PIPEFITTERS AND HVAC/R SERVICE TECHNICIANS, a labor organization; CONDRON HOMES LLC, a limited liability company; PARAS HOMES LLC, a limited liability company; GARCO CONSTRUCTION INC., a for-profit corporation, NATIONAL PROPANE GAS ASSOCIATION, a national trade association, CITIZEN ACTION DEFENSE FUND, a nonprofit corporation; AVISTA	TRICT OF WASHINGTON No. 1:23-cv-03070-SAB DECLARATION OF BRIAN L.
112 113 114 115 116 117 118	JAMON RIVERA, an individual; INLAND NW AGC, a membership organization; SPOKANE HOME BUILDER'S ASSOCIATION, a nonprofit corporation; WASHINGTON STATE ASSOCIATION OF UA PLUMBERS, PIPEFITTERS AND HVAC/R SERVICE TECHNICIANS, a labor organization; CONDRON HOMES LLC, a limited liability company; PARAS HOMES LLC, a limited liability company; GARCO CONSTRUCTION INC., a for-profit corporation, NATIONAL PROPANE GAS ASSOCIATION, a national trade association, CITIZEN ACTION	TRICT OF WASHINGTON No. 1:23-cv-03070-SAB DECLARATION OF BRIAN L.

1	Plaintiffs,
2	v.
3	WASHINGTON STATE BUILDING CODE COUNCIL,
4	Defendant.
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Declaration of Brian L. Robertson

- 1. My name is Brian L. Robertson. I am employed by Cascade Natural Gas Corporation ("Cascade") as Supervisor of Resource Planning.
 - 2. I have personal knowledge of the facts set forth herein.

Professional Background

- 3. I graduated from Central Washington University with a degree in Actuarial Science. After graduating, I joined Cascade in February 2014 as a Regulatory Analyst. I joined the Gas Supply department in March 2015 as a Resource Planning Analyst II. In July 2016, I was promoted to Senior Resource Planning Analyst. In June 2019, I was promoted to Supervisor of Resource Planning.
- 4. As Supervisor of Resource Planning, my job duties include supervising two analysts, as well as performing long-term forecasting, market research, upstream modeling, and other duties regarding Cascade's Integrated Resource Plan.

The Appliance Restrictions Harm Cascade's Customer Growth

5. Sections C403.1.4, C404.2.1, Table C407.2, C502.2.4, C502.2.5, C503.4.6, C503.5, R403.5.7, R403.13, Table R405.2(1), R503.1.2, R503.1.3, R502.3.2, and R502.3.3 of the 2021 Washington Energy Codes (collectively, "Appliance Restrictions") ban in many instances gas space and water heating appliances in residential and commercial buildings.

6. Previously, in 2020-2022, Cascade added 9,694 new residential and commercial customers to its customer base in Washington. This consisted of 766 new commercial customers and 8,928 new residential customers. In light of the Appliance Restrictions, Cascade anticipates this level of new customer growth to decline.

Row Labels	12/31/2019	12/31/2020	12/31/2021	12/31/2022	2020-2022
GAS-FIRM COMMERCIAL	26,880	27,055	27,394	27,646	766
GAS-RESIDENTIAL	193,905	197,405	200,510	202,833	8,928
Grand Total	220,785	224,460	227,904	230,479	9,694

7. Before the adoption of the Appliance Restrictions, Cascade forecasted adding 24,970 new residential customers in Washington between 2024-2030 in the Integrated Resource Plan Cascade submitted to the Washington Utilities and Transportation Commission. Cascade Natural Gas Corporation, 2023 Cascade IRP – Appendix B, 139, In the Matter of Cascade Natural Gas Corporation 2023 Integrated Resource Plan, Washington Utilities and Transportation Commission Docket No. UG-220131 (Feb. 24, 2023) (See Attachment 1). This represents the addition of approximately 3,567 customers a year in Washington.

8. On the commercial side, before the Appliance Restrictions, Cascade forecasted in its Integrated Resource Plan that it would have approximately 3,140 new commercial customers between 2024-2030. *Id.* This represents the addition of approximately 449 commercial customers a year in Washington.

9. As a result of the Appliance Restrictions, Cascade projects that it will face a significant decline in the above forecasted growth levels set forth in its Integrated Resource Plan.

10. In proceedings before the Washington Utilities and Transportation Commission, multiple parties, including the Commission's Staff, have cited the 2021 Washington State Energy Codes as a reason why Cascade will not have future customer growth and will experience a decline in customers overall. *See, e.g.,* Washington Utilities and Transportation Commission, *Commission Staff Comments Regarding 2023 Natural Gas Integrated Resource Plan, 5*, In the Matter of Cascade Natural Gas Corporation 2023 Integrated Resource Plan, Washington Utilities and Transportation Commission Docket No. UG-220131 (Apr. 28, 2023) ("Combined, Staff finds these statutes and code changes should result in zero customer growth by 2031. After which time, the natural rate of building stock attrition should consistently decrease customer counts.") (*See* Attachment 2).

11. The addition of new customers to the gas system helps maintain the current gas system to ensure safety, reliability, and resiliency by providing funds to maintain and upgrade Cascade's infrastructure while allowing these costs to be spread over a growing customer base, thereby keeping costs for individual customers at a reasonable level. Thus, sharply curtailing the addition of new customers to the gas system will increase gas service costs for existing customers.

1	12. The combination of the above negative impacts of the Appliance Restrictions							
2	poses significant harm to Cascade.							
3	13. I declare, under penalty of perjury, that the foregoing is true and correct.							
4	Executed on June 1, 2023:							
5	/s/ Brian Robertson							
6	ian L. Robertson pervisor of Resource Planning							
7	Cascade Natural Gas Corporation							
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DECLARATION OF BRIAN L. ROBERTSON - ATTACHMENT 1

2023 Cascade IRP – Appendix B, 139, In the Matter of Cascade Natural Gas Corporation 2023 Integrated Resource Plan, Washington Utilities and Transportation Commission Docket No. UG-220131 (Feb. 24, 2023)

ı	Cascade Natural Gas 2023 IRP Demand Forecast Summary Tables																
	Washington Annual Requirements (Therms)								Annual Change								
2023	Heating 186,498,200	Baseload 68.225.877	Total 254,724,076	Heating 188.457.692	Baseload 68.225.877	Total 256.683.569	Heating 195,488,010	High Baseload 68.225.877	Total 263.713.887	Heating Baseload 0.00% 0.00%	Total 0.00%		Baseload 0.00%	Total 0.00%	Heating B	High aseload 0.00%	Total 0.00%
2023 2024 2025	187,627,840 186,361,712	69,745,300 70,875,617	257,373,140 257,237,329	192,126,033 192,901,853	69,745,300 70,875,617	261,871,333 263,777,469	200,730,948 203,444,898	69,745,300 70,875,617	270,476,248 274,320,515	0.61% 2.23% -0.67% 1.62%	1.04%	1.95%	2.23%	2.02%	2.68%	2.23% 1.62%	2.56%
2025 2026 2027	186,081,284 186,078,113	72,171,863 73,057,563	258,253,146 259,135,676	194,784,480 196,946,212	72,171,863 73,057,563	266,956,343 270,003,774	207,585,364 211,863,809	72,171,863 73,057,563	279,757,227 284,921,372	-0.67% 1.82% -0.15% 1.83% 0.00% 1.23%	0.39%	0.98%	1.83%	1.21%	2.04%	1.83%	1.98%
2028	187,220,485 185,545,342	73,959,722 75,381,656	261,180,207 260,926,998	200,319,184	73,959,722 75,381,656	274,278,905 276,405,857	217,877,734 220,350,445	73,959,722 75,381,656	291,837,456 295,732,101	0.61% 1.23% -0.89% 1.92%	0.79%	1.71%	1.23%	1.58%	2.84%	1.23%	2.43%
2030	185,541,092 185,277,471	75,932,562 77,055,267	261,473,654 262,332,738	203,070,734 204,938,521	75,932,562 77,055,267	279,003,296 281,993,788	224,171,914 228,673,402	75,932,562 77,055,267	300,104,476 305,728,669	0.00% 0.73% -0.14% 1.48%	0.21%	1.02%	0.73%	0.94%	1.73%	0.73%	1.48%
2032	186,396,764 184,780,914	77,729,068 78,761,010	264,125,831 263,541,924	208,422,776	77,729,068 78,761,010	286,151,844 287,583,745	234,295,119 236,880,819	77,729,068 78,761,010	312,024,187 315,641,829	0.60% 0.87% -0.87% 1.33%	0.68%	1.70%	0.87%	1.47%	2.46%	0.87%	2.06%
2034	184,254,856 183,773,896	79,970,409 81,101,460	264,225,265 264,875,355	210,595,706 212,257,505	79,970,409 81,101,460	290,566,115 293,358,965	241,223,803 245,141,208	79,970,409 81,101,460	321,194,212 326,242,668	-0.28% 1.54% -0.26% 1.41%	0.26% 0.25%	0.85% 0.79%	1.54% 1.41%	1.04% 0.96%	1.83%	1.54% 1.41%	1.76% 1.57%
2036 2037	184,852,617 182,932,307	81,995,247 83,383,150	266,847,864 266,315,457	215,595,853 215,866,449	81,995,247 83,383,150	297,591,100 299,249,599	251,643,619 253,972,718	81,995,247 83,383,150	333,638,866 337,355,868	0.59% 1.10% -1.04% 1.69%	0.74% -0.20%	1.57% 0.13%	1.10% 1.69%	1.44% 0.56%	2.65% 0.93%	1.10% 1.69%	2.27% 1.11%
2038 2039	182,739,261 182,157,062	84,160,506 85,374,840	266,899,767 267,531,901	217,771,439 219,408,506	84,160,506 85,374,840	301,931,946 304,783,346	258,241,535 262,812,679	84,160,506 85,374,840	342,402,041 348,187,519	-0.11% 0.93% -0.32% 1.44%	0.22% 0.24%	0.88% 0.75%	0.93% 1.44%	0.90% 0.94%	1.68% 1.77%	0.93% 1.44%	1.50% 1.69%
2040 2041	182,723,066 181,197,889	86,510,012 87,551,428	269,233,078 268,749,318	222,336,096 222,649,245	86,510,012 87,551,428	308,846,108 310,200,674	268,186,889 271,509,840	86,510,012 87,551,428	354,696,901 359,061,268	0.31% 1.33% -0.83% 1.20%	0.64% -0.18%	1.33% 0.14%	1.33% 1.20%	1.33% 0.44%	2.04% 1.24%	1.33%	1.87% 1.23%
2042 2043	180,494,020 179,893,327	88,769,202 89,868,933	269,263,222 269,762,260	224,279,837 225,763,882	88,769,202 89,868,933	313,049,039 315,632,815	275,419,394 279,443,501	88,769,202 89,868,933	364,188,596 369,312,434	-0.39% 1.39% -0.33% 1.24%	0.19% 0.19%	0.73% 0.66%	1.39% 1.24%	0.92% 0.83%	1.44% 1.46%	1.39% 1.24%	1.43% 1.41%
2044 2045	180,850,033 178,876,828	90,647,262 91,905,795	271,497,295 270,782,623	229,137,172 229,243,528	90,647,262 91,905,795	319,784,434 321,149,324	286,294,885 288,388,486	90,647,262 91,905,795	376,942,147 380,294,281	0.53% 0.87% -1.09% 1.39%	0.64% -0.26%	1.49% 0.05%	0.87% 1.39%	1.32% 0.43%	2.45% 0.73%	0.87% 1.39%	2.07% 0.89%
2046 2047	177,925,352 176,847,226	93,058,742 94,620,910	270,984,094 271,468,136	230,187,240 231,371,783	93,058,742 94,620,910	323,245,983 325,992,693	291,818,127 296,114,363	93,058,742 94,620,910	384,876,869 390,735,273	-0.53% 1.25% -0.61% 1.68%	0.07% 0.18%	0.41% 0.51%	1.25% 1.68%	0.65% 0.85%	1.19% 1.47%	1.25% 1.68%	1.21% 1.52%
2048 2049	177,862,284 175,439,564	95,152,511 95,858,615	273,014,795 271,298,178	234,652,645 235,126,324	95,152,511 95,858,615	329,805,155 330,984,939	302,345,400 305,814,463	95,152,511 95,858,615	397,497,911 401,673,078	0.57% 0.56% -1.36% 0.74%	0.57% -0.63%	1.42% 0.20%	0.56% 0.74%	1.17% 0.36%	2.10% 1.15%	0.56% 0.74%	1.73% 1.05%
2050	174,654,018	96,999,012	271,653,031	236,542,907	96,999,012	333,541,920	309,794,783	96,999,012	406,793,795	-0.45% 1.19%	0.13%	0.60%	1.19%	0.77%	1.30%	1.19%	1.27%
	ı	Low			Peak Day - Base Expected	ioad		High		Low			ial Change expected		Т	High	
2022	Daily Baseload	Peak	Total 1,687,551	Daily Baseload	Peak 1,700,556	Total	Daily Baseload	Peak	Total	Base Peak	Total	Base 0.00%	Peak	Total		Peak	Total
2023 2024 2025	186,920 191,083 194,180	1,500,631 1,487,811 1,501,240	1,687,551 1,678,894 1,695,419	186,920 191,083 194,180	1,700,556 1,696,476 1,723,208	1,887,476 1,887,559 1,917,388	186,920 191,083 194,180	2,222,637 2,223,813 2,266,848	2,409,557 2,414,896 2,461,028	0.00% 0.00% 2.23% -0.85% 1.62% 0.90%	0.00% -0.51% 0.98%	0.00% 2.23% 1.62%	0.00% -0.24% 1.58%	0.00% 0.00% 1.58%	0.00% 2.23% 1.62%	0.00% 0.05% 1.94%	0.00% 0.22% 1.91%
2025 2026 2027	197,731 200,158	1,501,240 1,547,417 1,562,939	1,745,148 1,763,096	194,180 197,731 200,158	1,723,208 1,785,338 1,814,579	1,917,388 1,983,069 2,014,737	194,180 197,731 200,158	2,266,848 2,355,405 2,401,202	2,553,136 2,601,359	1.83% 3.08% 1.23% 1.00%	2.93% 1.03%	1.83%	3.61% 1.64%	3.43% 1.60%	1.83%	3.91% 1.94%	3.74% 1.89%
2028	202,629	1,583,188	1,785,817 1,806,479	202,629 206,525	1,846,755 1,874,331	2,049,385 2,080,856	202,629 206,525	2,448,750 2,490,242	2,651,380 2,696,767	1.23% 1.30% 1.92% 1.06%	1.29%	1.23%	1.77%	1.72%	1.23%	1.98%	1.92%
2030	208,034 211,110	1,585,714	1,793,748 1,815,387	208,034 211,110	1,866,635	2,074,669	208,034 211,110	2,484,485 2,528,104	2,692,519 2,739,214	0.73% -0.89% 1.48% 1.17%	-0.70% 1.21%	0.73%	-0.41% 1.58%	-0.30% 1.57%	0.73%	-0.23% 1.76%	-0.16% 1.73%
2032 2033	212,956 215,784	1,653,846 1,666,089	1,866,802 1,881,873	212,956 215,784	1,962,061 1,990,081	2,175,018 2,205,865	212,956 215,784	2,620,847 2,666,882	2,833,804 2,882,665	0.87% 3.09% 1.33% 0.74%	2.83% 0.81%	0.87% 1.33%	3.48% 1.43%	3.22% 1.42%	0.87%	3.67% 1.76%	3.45% 1.72%
2034	219,097 222,196	1,683,448 1,704,241	1,902,545 1,926,437	219,097 222,196	2,019,131 2,048,347	2,238,228 2,270,543	219,097 222,196	2,710,266 2,751,059	2,929,363 2,973,255	1.54% 1.04% 1.41% 1.24%	1.10% 1.26%	1.54% 1.41%	1.46% 1.45%	1.47% 1.44%	1.54%	1.63% 1.51%	1.62% 1.50%
2036 2037	224,645 228,447	1,691,667 1,738,211	1,916,311 1,966,658	224,645 228,447	2,041,534 2,107,390	2,266,179 2,335,837	224,645 228,447	2,745,185 2,840,294	2,969,830 3,068,741	1.10% -0.74% 1.69% 2.75%	-0.53% 2.63%	1.10% 1.69%	-0.33% 3.23%	-0.19% 3.07%	1.10%	-0.21% 3.46%	-0.12% 3.33%
2038 2039	230,577 233,904	1,755,138 1,771,480	1,985,715 2,005,383	230,577 233,904	2,135,820 2,166,158	2,366,397 2,400,062	230,577 233,904	2,882,940 2,929,180	3,113,517 3,163,084	0.93% 0.97% 1.44% 0.93%	0.97% 0.99%	0.93% 1.44%	1.35% 1.42%	1.31% 1.42%	0.93% 1.44%	1.50% 1.60%	1.46% 1.59%
2040 2041	237,014 239,867	1,791,001 1,772,681	2,028,015 2,012,548	237,014 239,867	2,194,366 2,182,888	2,431,380 2,422,755	237,014 239,867	2,969,263 2,958,528	3,206,277 3,198,394	1.33% 1.10% 1.20% -1.02%	1.13% -0.76%	1.33% 1.20%	1.30% -0.52%	1.30% -0.35%	1.33%	1.37% -0.36%	1.37% -0.25%
2042 2043	243,203 246,216	1,788,244 1,838,945	2,031,447 2,085,161	243,203 246,216	2,210,031 2,279,866	2,453,234 2,526,082	243,203 246,216	2,999,649 3,098,968	3,242,852 3,345,185	1.39% 0.88% 1.24% 2.84%	0.94% 2.64%	1.39% 1.24%	1.24% 3.16%	1.26% 2.97%	1.39% 1.24%	1.39% 3.31%	1.39% 3.16%
2044 2045	248,349 251,797	1,859,814 1,874,660	2,108,163 2,126,457	248,349 251,797	2,313,720 2,340,748	2,562,069 2,592,545	248,349 251,797	3,147,935 3,189,108	3,396,283 3,440,905	0.87% 1.13% 1.39% 0.80%	1.10% 0.87%	0.87% 1.39%	1.48% 1.17%	1.42% 1.19%	0.87% 1.39%	1.58% 1.31%	1.53% 1.31%
2046 2047	254,955 259,235	1,887,520 1,866,911	2,142,475 2,126,146	254,955 259,235	2,365,478 2,349,575	2,620,434 2,608,810	254,955 259,235	3,227,942 3,210,169	3,482,897 3,469,404	1.25% 0.69% 1.68% -1.09%	0.75% -0.76%	1.25% 1.68%	1.06% -0.67%	1.08% -0.44%	1.25% 1.68%	1.22% -0.55%	1.22% -0.39%
2048	260,692 262,626	1,920,480 1,938,576	2,181,172 2,201,202	260,692 262,626 265,751	2,424,256 2,455,734	2,684,948 2,718,360	260,692 262,626	3,316,470 3,362,765	3,577,161 3,625,392	0.56% 2.87% 0.74% 0.94% 1.19% 0.79%	2.59% 0.92% 0.84%	0.56% 0.74% 1.19%	3.18% 1.30%	2.92% 1.24%	0.56% 0.74% 1.19%	3.31%	3.11% 1.35%
2050	265,751	1,953,984	2,219,734		2,484,381 herms Usage by	2,750,132	265,751	3,406,394	3,672,145	1.19% 0.79%	0.84%		1.17% ual Change	1.17%	1.19%	1.30%	1.29%
	Res	Low Com/Ind	Total	Res	Expected Com/Ind	Total	Res	High Com/Ind	Total	Res Com/Ind	Total	į	xpected Com/Ind	Total		High om/Ind	Total
2023 2024	132,624,479 134,049,813	122,099,597 123,323,327	254,724,076 257,373,140	133,712,148 136,321,636	122,971,421 125,549,697	256,683,569 261,871,333	137,275,979 141,035,126	126,437,908 129,441,122	263,713,887 270,476,248	0.00% 0.00% 1.07% 1.00%	0.00% 1.04%	0.00% 1.95%	0.00% 2.10%	0.00% 2.02%	0.00%	0.00%	0.00% 2.56%
2025 2026	133,988,307 134,494,059	123,249,022 123,759,088	257,237,329 258,253,146	137,424,229 139,101,409	126,353,240 127,854,934	263,777,469 266,956,343	143,251,853 146,087,721	131,068,662 133,669,506	274,320,515 279,757,227	-0.05% -0.06% 0.38% 0.41%	-0.05% 0.39%	0.81% 1.22%	0.64% 1.19%	0.73% 1.21%	1.57% 1.98%	1.26% 1.98%	1.42% 1.98%
2027 2028	134,973,559 136,023,599	124,162,117 125,156,608	259,135,676 261,180,207	140,752,251 143,003,976	129,251,524 131,274,930	270,003,774 274,278,905	148,915,837 152,415,840	136,005,535 139,421,616	284,921,372 291,837,456	0.36% 0.33% 0.78% 0.80%	0.34% 0.79%	1.19% 1.60%	1.09% 1.57%	1,14% 1.58%	1.94% 2.35%	1.75% 2.51%	1.85% 2.43%
2029 2030	135,901,528 136,332,641	125,025,470 125,141,013	260,926,998 261,473,654	144,025,257 145,624,983	132,380,600 133,378,313	276,405,857 279,003,296	154,611,747 157,448,808	141,120,354 142,655,668	295,732,101 300,104,476	-0.09% -0.10% 0.32% 0.09%	-0.10% 0.21%	0.71% 1.11%	0.84% 0.75%	0.78% 0.94%	1.44% 1.83%	1.22% 1.09%	1.33% 1.48%
2031 2032	136,753,105 137,749,150	125,579,634 126,376,681	262,332,738 264,125,831	147,210,869 149,425,856	134,782,919 136,725,987	281,993,788 286,151,844	160,299,327 163,859,069	145,429,342 148,165,118	305,728,669 312,024,187	0.31% 0.35% 0.73% 0.63%	0.33% 0.68%	1.09% 1.50%	1.05% 1.44%	1.07% 1.47%	1.81% 2.22%	1.94% 1.88%	1.87% 2.06%
2033 2034	137,460,430 137,794,497	126,081,494 126,430,768	263,541,924 264,225,265	150,244,120 151,733,588	137,339,625 138,832,527	287,583,745 290,566,115	165,893,952 168,690,182	149,747,877 152,504,030	315,641,829 321,194,212	-0.21% -0.23% 0.24% 0.28%	-0.22% 0.26%	0.55%	0.45% 1.09%	0.50% 1.04%	1.24% 1.69%	1.07%	1.16%
2035 2036 2037	138,158,190 139,153,627 138,879,085	126,717,165 127,694,237 127,436,372	264,875,355 266,847,864 266.315.457	153,254,280 155,483,205 156,289,783	140,104,685 142,107,895 142,959,816	293,358,965 297,591,100 299,249,599	171,538,694 175,211,516 177,285,285	154,703,974 158,427,350 160,070,583	326,242,668 333,638,866 337,355,868	0.26% 0.23% 0.72% 0.77% -0.20% -0.20%	0.25% 0.74% -0.20%	1.00% 1.45% 0.52%	0.92% 1.43% 0.60%	0.96% 1.44% 0.56%	1.69% 2.14% 1.18%	1.44% 2.41% 1.04%	1.57% 2.27% 1.11%
2037 2038 2039	139,209,716 139,507,850	127,436,372 127,690,051 128,024,052	266,899,767 267,531,901	157,770,146 159,210,819	144,161,800 145,572,527	301,931,946 304,783,346	177,285,285 180,140,691 182,969,594	162,261,350 165,217,925	342,402,041 348,187,519	0.24% 0.20% 0.21% 0.26%	0.22% 0.24%	0.95%	0.84%	0.90%	1.61%	1.37%	1.50%
2040 2041	140,442,188 140,137,763	128,790,891 128,611,555	269,233,078 268,749,318	161,385,447 162,130,478	147,460,661 148,070,195	308,846,108 310,200,674	186,670,521 188,719.665	168,026,380 170,341,603	354,696,901 359.061.268	0.67% 0.60% -0.22% -0.14%	0.64%	1.37%	1.30%	1.33%	2.02%	1.70%	1.87%
2042	140,419,172 140,689,722	128,844,050 129,072,538	269,263,222 269,762,260	163,546,331 164,948,510	149,502,708 150,684,306	313,049,039 315,632,815	191,568,438 194,415,028	172,620,158 174,897,406	364,188,596 369,312,434	0.20% 0.18% 0.19% 0.18%	0.19%	0.87%	0.97%	0.92%	1.51%	1.34%	1.43%
2044 2045	141,547,562 141,180,770	129,949,733 129,601,853	271,497,295 270,782,623	167,046,256 167,690,580	152,738,177 153,458,743	319,784,434 321,149,324	198,112,675 200,081,193	178,829,472 180,213,088	376,942,147 380,294,281	0.61% 0.68% -0.26% -0.27%	0.64% -0.26%	1.27% 0.39%	1.36% 0.47%	1.32% 0.43%	1.90% 0.99%	2.25% 0.77%	2.07% 0.89%
2046 2047	141,439,156 141,660,830	129,544,938 129,807,305	270,984,094 271,468,136	169,070,218 170,405,020	154,175,764 155,587,673	323,245,983 325,992,693	202,948,872 205,772,392	181,927,997 184,962,881	384,876,869 390,735,273	0.18% -0.04% 0.16% 0.20%	0.07% 0.18%	0.82% 0.79%	0.47% 0.92%	0.65% 0.85%	1.43% 1.39%	0.95% 1.67%	1.21% 1.52%
2048 2049	142,492,772 142,077,618	130,522,022 129,220,560	273,014,795 271,298,178	172,481,469 173,039,669	157,323,686 157,945,270	329,805,155 330,984,939	209,526,030 211,425,032	187,971,881 190,248,046	397,497,911 401,673,078	0.59% 0.55% -0.29% -1.00%	0.57% -0.63%	1.22% 0.32%	1.12% 0.40%	1.17% 0.36%	1.82% 0.91%	1.63% 1.21%	1.73% 1.05%
2050	142,254,692	129,398,339	271,653,031	174,311,078 Ct	159,230,841 ustomer Count Fe	333,541,920 precast	214,215,942	192,577,853	406,793,795	0.12% 0.14%	0.13%	0.73% Annu	0.81% ual Change	0.77%	1.32%	1.22%	1.27%
	Res	Low Com/Ind	Total	Res	Expected Com/Ind	Total	Res	High Com/Ind	Total	Res Com/Ind	Total	Res	xpected Com/Ind	Total	Res C	High om/Ind	Total
2023 2024	204,030 205,745	28,321 28,541	232,351 234,285	207,857 211,432	28,838 29,291	236,695 240,723	211,331 216,689	29,296 29,978	240,626 246,667	0.00% 0.00% 0.84% 0.77%	0.00% 0.83%	0.00% 1.72%	0.00% 1.57%	0.00% 1.70%	0.00% 2.54%	0.00% 2.33%	0.00% 2.51%
2025 2026	207,440 209,117	28,753 28,964	236,193 238,081	214,995 218,561	29,732 30,180	244,727 248,741	222,087 227,532	30,652 31,332	252,739 258,864	0.82% 0.75% 0.81% 0.73%	0.81% 0.80%	1.69% 1.66%	1.50% 1.51%	1.66% 1.64%	2.49% 2.45%	2.25% 2.22%	2.46% 2.42%
2027 2028	210,778 212,429	29,175 29,385	239,953 241,814	222,124 225,696	30,634 31,082	252,758 256,778	233,022 238,581	32,024 32,723	265,047 271,304	0.79% 0.73% 0.78% 0.72%	0.79% 0.78%	1.63% 1.61%	1.50% 1.46%	1.61% 1.59%	2.41% 2.39%	2.21% 2.18%	2.39% 2.36%
2029 2030	214,062 215,679	29,591 29,796	243,653 245,475	229,261 232,827	31,529 31,978	260,790 264,805	244,174 249,812	33,421 34,125	277,595 283,937	0.77% 0.70% 0.76% 0.69%	0.76% 0.75%	1.58% 1.56%	1.44% 1.42%	1.56% 1.54%	2.34% 2.31%	2.13% 2.11%	2.32% 2.28%
2031 2032	217,287 218,882	29,999 30,202	247,286 249,084	236,390 239,961	32,426 32,874	268,816 272,835	255,512 261,264	34,835 35,552	290,347 296,817	0.75% 0.68% 0.73% 0.68%	0.74% 0.73%	1.53% 1.51%	1.40% 1.38%	1.51% 1.50%	2.28% 2.25%	2.08% 2.06%	2.26% 2.23%
2033	220,461 222,027	30,402 30,602	250,862 252,629	243,524 247,087	33,320 33,769	276,844 280,856	267,049 272,881	36,272 37,002	303,321 309,883	0.72% 0.66% 0.71% 0.66%	0.71%	1.48%	1.36%	1.47%	2.21%	2.02%	2.19%
2035 2036	223,581 225,127	30,799 30,997	254,380 256,125	250,650 254,224	34,218 34,669	284,868 288,893	278,761 284,703	37,732 38,478	316,492 323,182	0.70% 0.64% 0.69% 0.64%	0.69%	1.44%	1.33%	1.43%	2.15%	1.97%	2.13%
	226,659 228,178	31,192 31,385	257,851 259,563	257,788 261,353	35,118 35,563	292,906 296,916	290,678 296,693	39,221 39,966	329,899 336,659	0.68% 0.63% 0.67% 0.62%	0.67%	1.40%	1.29%	1.39%	2.10%	1.93%	2.08%
2037		31,578	261,264	264,914 268,488	36,015 36,458	300,929 304,946	302,757 308,878	40,720 41,476	343,477 350,354	0.66% 0.61% 0.65% 0.60%	0.66% 0.65% 0.64%	1.36% 1.35%	1.27% 1.23%	1.35% 1.33%	2.04%	1.89% 1.86%	2.03%
2038 2039 2040	229,686 231,187	31,768	262,955														
2038 2039 2040 2041 2042	229,686 231,187 232,673 234,150	31,768 31,958 32,149	264,632 266,299	272,047 275,612	36,910 37,360	308,957 312,972	315,027 321,223	42,243 43,016	357,269 364,240	0.64% 0.60% 0.63% 0.60%	0.63%	1.33%	1.24%	1.32%	1.99%	1.85%	1.97%
2038 2039 2040 2041 2042 2043 2044	229,686 231,187 232,673 234,150 235,616 237,077	31,768 31,958 32,149 32,333 32,522	264,632 266,299 267,949 269,599	272,047 275,612 279,176 282,746	36,910 37,360 37,806 38,258	312,972 316,982 321,004	321,223 327,461 333,760	43,016 43,778 44,567	364,240 371,238 378,327	0.63% 0.60% 0.63% 0.57% 0.62% 0.58%	0.63% 0.62% 0.62%	1.31% 1.29% 1.28%	1.22% 1.19% 1.20%	1.30% 1.28% 1.27%	1.97% 1.94% 1.92%	1.83% 1.77% 1.80%	1.95% 1.92% 1.91%
2038 2039 2040 2041 2042 2043 2044 2045 2046	229,686 231,187 232,673 234,150 235,616 237,077 238,523 239,962	31,768 31,958 32,149 32,333 32,522 32,706 32,889	264,632 266,299 267,949 269,599 271,229 272,851	272,047 275,612 279,176 282,746 286,308 289,873	36,910 37,360 37,806 38,258 38,705 39,151	312,972 316,982 321,004 325,013 329,024	321,223 327,461 333,760 340,081 346,452	43,016 43,778 44,567 45,347 46,134	364,240 371,238 378,327 385,427 392,587	0.63% 0.60% 0.63% 0.57% 0.62% 0.58% 0.61% 0.57% 0.60% 0.56%	0.63% 0.62% 0.62% 0.60% 0.60%	1.31% 1.29% 1.28% 1.26% 1.25%	1.22% 1.19% 1.20% 1.17% 1.15%	1.30% 1.28% 1.27% 1.25% 1.23%	1.97% 1.94% 1.92% 1.89% 1.87%	1.83% 1.77% 1.80% 1.75% 1.74%	1.95% 1.92% 1.91% 1.88% 1.86%
2038 2039 2040 2041 2042 2043 2044 2045	229,686 231,187 232,673 234,150 235,616 237,077 238,523	31,768 31,958 32,149 32,333 32,522 32,706	264,632 266,299 267,949 269,599 271,229	272,047 275,612 279,176 282,746 286,308	36,910 37,360 37,806 38,258 38,705	312,972 316,982 321,004 325,013	321,223 327,461 333,760 340,081	43,016 43,778 44,567 45,347	364,240 371,238 378,327 385,427	0.63% 0.60% 0.63% 0.57% 0.62% 0.58% 0.61% 0.57%	0.63% 0.62% 0.62% 0.60%	1.31% 1.29% 1.28% 1.26%	1.22% 1.19% 1.20% 1.17%	1.30% 1.28% 1.27% 1.25%	1.97% 1.94% 1.92% 1.89%	1.83% 1.77% 1.80% 1.75%	1.95% 1.92% 1.91% 1.88%

DECLARATION OF BRIAN L. ROBERTSON - ATTACHMENT 2

Commission Staff Comments Regarding 2023
Natural Gas Integrated Resource Plan, 5, In
the Matter of Cascade Natural Gas
Corporation 2023 Integrated Resource Plan,
Washington Utilities and Transportation
Commission Docket No. UG-220131 (Apr. 28,
2023)

Major Staff Concerns

While Staff provides numerous recommendations in response to Cascade's IRP, the central and principal concerns for Staff are the (1) Demand Forecast, and (2) CCA analysis. These two components are the keystones of the IRP. The central question of the IRP document is to "meet current and future needs at the lowest reasonable cost to the utility and its ratepayers." The demand forecast defines the need and the CCA drives much of the future cost analysis.

As will be explained in further detail below, Cascade notes that growth in customer counts drives the demand forecast. Staff finds that Cascade does not consider the impact of building codes and building code statutes that will significantly impact customer counts. Recent building code changes are substantially reducing the ability of customers to install natural gas furnaces in some new buildings. By statutory mandate, these restrictions should continue to tighten in the future. Further, the State Building Code Council has a statutory goal of reducing emissions from fossil fuels in new buildings to zero by 2031. Combined, Staff finds these statutes and code changes should result in zero customer growth by 2031. After which time, the natural rate of building stock attrition should consistently decrease customer counts. These clear statutory bounds on customer counts contrast sharply with Cascade's assumptions about demand growth every year indefinitely into the future.

As will be discussed at greater length below, Staff identified significant issues with Cascade's limited analysis of the CCA. The Company bears additional costs through the requirement to purchase emissions allowances or other compliance resources. Previously, gas utilities typically only had to analyze the lowest reasonable cost between natural gas and conservation. In 2023, gas utilities are required to assess the lowest reasonable cost with regards to natural gas, free allowances, auctioned allowances, offsets, RNG, various green synthetic fuels, as well as penalties for non-compliance. Staff notes that Cascade does not consider RNG, limitations on the number of allowances sold at auction, nor problems with relying upon Price Ceiling Units. Staff finds that failing to include these compliance resources and limitations in its analysis makes Cascade's lowest reasonable cost analysis inadequate. The purpose of an IRP is to examine a range of resources and forecasts of future natural gas demand in order to develop a "short-term plan outlining the specific actions to be taken by the utility in implementing the long-range integrated resource plan during the two years following submission."

The IRP lacks an accurate demand forecast and CCA analysis, which introduces risk into planning of current or potential acquisition(s) of resources. The regulatory landscape has shifted dramatically since the last IRP in 2020. These changes have large implications for ratepayers, and it is imperative that gas utilities conduct accurate analysis now so that foreseeable harm can be avoided.

¹⁰ WAC 480-90-238(2)(a)

¹¹ WAC 480-90-238(3)(h)